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# 31

## Action

### *Public Hearing*

#### **Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to the PK-3 Early Childhood Education Specialist Instruction Credential**

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## AGENDA INSERT

**Executive Summary:** This agenda item presents a public hearing requested by a member of the public on the proposed regulations of the California Code of Regulations (CCR), 80067, 80067.1, 80067.2, and 80067.3 approved by the Commission at its December 2022 Commission meeting to implement the PK-3 Early Childhood Education (ECE) Specialist Instruction Credential and the accompanying Program Preconditions, Program Standards, and Teaching Performance Expectations (TPEs).

**Recommended Action:** That the Commission consider written comments received and comments made during the public hearing to determine whether changes are needed to the proposed regulations and that the Commission consider recommended changes from staff based on public comments received.

**Presenters:** David DeGuire, Director, and Phyllis Jacobson and Renee Marshall, Administrators, Professional Services Division

### Strategic Plan Goal

#### ***II. Program Quality and Accountability***

- a) Develop and maintain rigorous, meaningful, and relevant standards that drive program quality and effectiveness for the preparation of the education workforce and are responsive to the needs of California's diverse student population

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# Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to the PK-3 Early Childhood Education Specialist Instruction Credential

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## Introduction

The Commission has received additional comments about the proposed regulations for the PK-3 Early Childhood Education Specialist Instruction credential since item 3I was posted. This insert summarizes the objections and recommended changes to the proposed regulations received as of 9:00 pm PDT on Tuesday, April 18, 2023, and provides responses to each. The full text of all comments received prior to April 6 are included in item 3I Appendix D. Comments received since April 6 can be found at <https://public.ctc.ca.gov/Meetings/PublicComments/19/368>.

## Background

Appendix B in item 3I summarized public comments received as of April 6, 2023. The summaries below do not repeat any themes identified in that appendix, but rather provide summaries of unique new comments.

**Table 1. Objections Made to the Proposed Regulations**

Objections	Details
1. Proposed PK-K authorization is misguided	<p><b>Main concern</b> – The bifurcation of the PK-K and PK-3 authorizations in Amendment 2 is a continued misunderstanding about what early childhood education does in the context of teacher preparation.</p> <p><i>Sample Comment - I find it important to look at the value statement of current proposed amendment #2:</i></p> <p><i>A student in my program who takes, say, coursework in Teaching in a Diverse Society, which informs future teachers on strategies to work with the diverse populations of California. Then take a course in Child and Adolescent Development which looks cognitive, social, and physical development of children (including brain research) which can inform their teaching of many age groups. Then maybe they take Language and Literacy in Multilingual Families and Communities at Cal Poly which examines theory and research on language learning in multilingual families and communities of diverse children (this covers ages 0-8). Or an observation and assessment course which helps future teachers learn how to authentically be with a child, gaining a deep understanding of the child, so that the teacher may then support that child in a wide variety of content areas (again this course focuses on children up to 8 years of age).</i></p>

	<p><i>This is just a brief list of courses. Our programs examine racism, literacy, mathematics as well as look at social context, family context, and the role of relationships in learning. Our students could go through our entire program, complete a BA in ECE, meet your proposed 400 hours in a kindergarten classroom, and the commission would never think that they could teach a 6-year-old. A multiple subject teacher credential holder on the other hand who maybe has spent their career teaching 10-year-olds, is qualified to teach our 5-year-olds correct? That is a value statement.</i></p> <p><i>The way I see the bifurcation of the authorization in Item 2 is a continued misunderstanding about what early childhood education does in the context of teacher preparation.</i></p> <p><i>Additionally, it is important to point out that the way we prepare our diverse ECE workforce has to do with equity. Equity involves the examination of barriers of marginalized folk and then responding with support or the removal of unnecessary barriers needed towards success. It is NOT about making things easier. The K-12 world is so far behind in representation of diversity compared to its ECE counterparts it is disgraceful and damaging to the children in California from those very groups. The proposed amendment 2 is an exact example of what many of us see happening daily. How does this proposal support those ECE teachers who think they could be successful teaching second grade to enter that role?</i></p> <p><i>All it does is keep them in their place.</i></p> <p><b>Response from Commission</b> –The proposed amendment #2 was developed in response to public comment regarding hardships for current early childhood teachers to complete two placements.</p> <p><b>Consideration of the proposed amendment and objections to this amendment is recommended.</b></p>
<p>2. Proposed PK-K authorization is problematic</p>	<p><b>Main concern</b> – The proposed PK-K authorization in Amendment 2 would be problematic for candidates.</p> <p><i>Sample Comment #1 - For: Proposed Amendment #2: Create two authorizations within the PK-3 ECE Specialist Instruction credential. While the intention is to reduce barriers for early childhood educators who want to teach TK while offering the option to add the full authorization through grade 3 after completing an additional 200 hours of clinical experience, bifurcating the PK-3 Early Childhood</i></p>

*Education Specialist Instruction Credential would ultimately disadvantage those who are awarded the PK-Kindergarten authorization in two ways (1) school districts are more likely to hire a Pk-3 than a PK-Kindergarten bearing candidate, and (2) PK-Kindergarten candidates if awarded the PK-Kindergarten authorization would have to complete an additional 200 hours, totaling 800 hours of clinical experience, which is inequitable and increase barriers, rather than reducing it. There needs to be another solution to this.*

*Sample comment #2 - While we appreciate the CTC's responsiveness to concerns raised about the impact the dual-focus clinical requirements could have on interns and candidates, we believe that the revised requirement to complete 200 hours in both PK/TK/K and Grades 1-3, as outlined in proposed amendments 3, will still be burdensome for interns pursuing this credential. We appreciate the efforts to further address these concerns through proposed amendment 2, which would create two authorizations for the PK-3 Credential. We see the creation of two authorizations as an opportunity to support those with preschool backgrounds interested in PK-K settings. Still, we also want to uplift the potential staffing challenges this may create for the administration.*

*We would like to continue working with the CTC to develop alternatives that could address the need to ensure candidates have the experience needed to teach in PK-3 settings while also limiting barriers that could keep quality educators from achieving this credential.*

*Sample comment #3 - This proposal has drawbacks that outweigh merits. It is conceivable that the initial and sequential professional preparation and completion of clinical practice hours (as one example shows, first in Preschool through Kindergarten, and later in grades 1 through 3), could more quickly result in more ECE-prepared teachers in PK, TK, and K teaching positions.*

*Ultimately, however, even if it were implemented for a short period, this proposal creates further bifurcation of our ECE/PK-3 workforce and does not build on the rationale and vision of a ECE Specialist Instruction Credential. Nor is this proposal centered on the subject matter for this credential—community college and baccalaureate preparation in EC/CD (2+2+1).*

*This bifurcation would cause confusion for candidates and for hiring schools, alike. Further, it is not acceptable to consider that clinical*

*practice for this credential be reduced to include only one age span (e.g., PK through K or in grades 1-3).*

*Our National Association for the Education of Young Children (NAEYC) higher education program accreditation guidelines require student candidates to complete supervised field experience in three age groups (0-3, 4-5, and 5-8). Completing clinical practice in one age group goes against best practices, foundational TBB8 research and PK-3 credentials across the US. Knowledge of children's development 0-8 years and pedagogical competency across 0-8 is central subject matter for all candidates for this new credential.*

*Sample comment #4 - Over the last year, I have heard from multiple superintendents who are concerned about the limitation of the PK-3 credential. Many have indicated their desire is to hire someone with a BA/BS in child development/ec/etc who completes a multiple subject credential. They like the child development subject matter and the flexibility with the multiple subject credential. I truly wonder if we are not doing the teacher candidate a disservice to give them only an authorization in PK-K. Likely during this emergency of needing thousands of new TK teachers, all may work, but down the road this seems like a hierarchical credential. It looks like the PK-K authorization will be seen as "less than." But, in fact, the teachers with this authorization have done all education the others have done but just not quite with the "correct" age range. I recommend if we want to begin with an authorization system than it must sunset in two or three years. That would meet the present emergency need for TK teachers without creating a permanent two-class credential.*

*Sample comment #5 - CTA and ACSA believe establishing two authorizations within the PK-3 ECE Specialist credential undermines the integrity of the credential by allowing for a permanent subset of educators with a restricted PK-K authorization who cannot engage fully in collaboration, articulation, and movement throughout the grade span. The proposed change alters the fundamental architecture of the credential outside of the inclusive development process undertaken by the Commission without sufficient time for engagement and deliberation. Creating a limited authorization within the PK-3 credential would severely hamper the school's ability to serve students since there are continuous fluctuations in enrollment. Further, such a narrow authorization would also place these teachers at an increased risk for layoff during reductions in staffing. CTA and ACSA are sensitive to the unique challenge posed by dual placements for interns and could*

	<p><i>support a limited accommodation for this specific group that would not alter the authorization of a clear PK-3 ECE credential.</i></p> <p><b>Response from Commission</b> – Proposed amendment #2 was developed in response to public comment regarding hardships for current early childhood teachers to complete two placements.</p> <p>Concerns about employability of teachers with a PK-K authorization only as well as confusion that having two authorizations within the same credential might cause should be considered.</p> <p><b>Consideration of the proposed amendment and objections to this amendment is recommended.</b></p>
<p>3. More time needed to review Amendment #3</p>	<p><b>Main concern</b> – More time is needed to vet Amendment #3.</p> <p><i>Sample Comment - CTA and ACSA oppose Amendment 3: Reconfiguration of the clinical practice grade levels.</i></p> <p><i>Because the content of Item 3I was shared only last week, CTA and ACSA have not had sufficient time to vet the Amendment with our members and adequately consider implications of shifting to clinical practice placements to PK-K and grades 1-3 instead of PK/TK and K-3. Consequently, we oppose this amendment and support maintaining the placement spans as designed during the Commission's inclusive development process.</i></p> <p><b>Response from Commission</b> –The proposed amendment #3 was developed to better align clinical practice expectations and was a logical result of amendment #2.</p> <p><b>Consideration of the proposed amendment and objections to this amendment is recommended.</b></p>
<p>4. Clarity needed on practicum courses</p>	<p><b>Main concern</b> – Clarity is needed about what comprises a practicum course.</p> <p><b>Sample comments</b> – <i>What does a practicum course encompass in a community college setting? How will CTC ensure compliance with Teaching Standards and guided clinical practice standards for these equivalencies?</i></p> <p><b>Response from Commission</b> – A practicum course in a community college setting mirrors the same processes and procedures as a clinical practice course at a four-year institution. Candidates are supervised within their placement setting, which is typically in a PK program</p>

	<p>classroom, and are provided with focused mentoring, observation, guided practice, and feedback on their performance throughout the length of the course from both their on-site mentors and the faculty from the community college responsible for that practicum class. The practicum class is a capstone experience for candidates at the community college level. The course carries degree-applicable, non-remedial credit.</p> <p>PK-3 ECE Specialist Instruction credential preparation programs will be located at four-year regionally accredited institutions of higher education, and the course requirements at Commission approved four-year institutions offering educator preparation are part of the Commission’s accreditation system. The community colleges have a system of specifically identified courses that form a common pathway known as the “AS-T,” or “associate degree for transfer.” This pathway has been developed through formal agreements with the four-year segments of California’s higher education institutions to allow for the smooth transfer of candidates and their AS-T pathway coursework from the community college system to the four-year institutions. To maintain and support this AS-T pathway, the community colleges have provided their syllabi and other coursework requirements, faculty qualifications, and other information as required by the four-year institutions in order for these courses to acceptably transfer for credit. The four-year teacher preparation programs accredited by the Commission accept these courses for credit as part of the established AS-T transfer process.</p> <p>All candidate completing a Commission approved PK-3 program will need to demonstrate competence with respect to the TPEs and will need to pass one of the appropriate Commission approved TPAs.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
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**Table 2. Recommended Changes to the Regulations**

Recommendations	Details
<p>1. Approve recommended changes to create PK-K authorization</p>	<p><b>Main recommendation</b> – Approve amendments to proposed regulations to create separate PK-K authorization.</p> <p><i>Sample comment #1 - I am writing to express my strong support for the proposed amendment to the regulations that would provide two possible authorization options within the PK-3 ECE (Early Childhood Education) Specialist Instruction credential. I believe that this proposal is a crucial step towards removing barriers for current ECE workforce members and better meeting the needs of the Universal PreK expansion.</i></p> <p><i>The addition of these two authorization options, one for teaching grades PK, TK, and Kindergarten, and the other for teaching PK through Grade 3, acknowledges the diverse expertise and experience of early childhood educators. It recognizes that educators who have focused on specific grade ranges or have a broader range of experience should be given the opportunity to obtain the appropriate authorization to teach in the grades that align with their skills and expertise.</i></p> <p><i>I urge the Commission to approve this proposed amendment to the regulations for the PK-3 ECE Specialist Instruction credential. It is a positive step towards improving the ECE workforce and providing the best possible education for our youngest learners.</i></p> <p><i>Sample comment #2 - After reading the three proposed amendments, I really appreciate your efforts in listening to the public. Please approve the three proposed amendments so that we can continue to work with the age group we are currently working with.</i></p> <p><i>Sample comment #3 - Children Now sincerely appreciates the amount of effort that has gone into developing the PK-3 Early Childhood Education Specialist Instruction Credential (PK-3 Credential). We applaud the Commissioners and Commission staff for their outreach and engagement efforts, receiving and making adjustments based on feedback from interest holders, early learning, and TK-12 education experts, and commitment to its timeline to develop this important and much-anticipated credential.</i></p> <p><i>Children Now urges the Commission to adopt the proposed regulations as presented in the agenda. Children Now strongly supports the Program Standards (80067.2) and Teaching Performance Expectations (TPEs) (80067.3) as proposed. These Standards and TPEs were carefully</i></p>



	<p><i>developed to support high-quality teaching, including literacy and mathematics teaching, in the early years. They include critical preparation in developmentally, culturally, and linguistically supportive and responsive pedagogies and practices. Finally, they help to prepare teachers to honor and build upon the assets students and their families bring into classrooms.</i></p> <p><i>Regarding the proposed amendments to the regulations, we support proposed amendment 1 related to the supervised practicum during undergraduate coursework. While we remain concerned with the requirement to have more than one clinical practice placement in order to be eligible for the full authorization of PK-3, as proposed in 80067 and 80067.1, proposed amendments 2 and 3 do eliminate the barriers lifted up as being of concern during the initial public comment period for the draft regulations. Therefore, we support the proposed amendments today, and look forward to continuing dialogue on clinical placements and scope of authorization as implementation of the credential progresses.</i></p> <p><b>Response from Commission</b> – Staff requests that the Commission consider the amendments provided in item 3I and Table 4 below, as well as the public comments received regarding the amendments.</p> <p><b><i>Consideration of the proposed amendments and objections to the amendments is recommended.</i></b></p>
<p>2. Bridge from PK-3 to Multiple Subject Credential</p>	<p><b>Main recommendation</b> – Create a bridge between PK-3 and Multiple Subject Credentials</p> <p><i>Sample comment - We would like to see a bridge between the PK-3 and Multiple Subject credential, with a seamless process for those who are working on dual credentials. We would also like clarity about the ability to split fieldwork for dual credential candidates and the 600 hour requirement.</i></p> <p><b>Response from Commission</b> – The proposed regulations allow a candidate who completes a Multiple Subject credential preparation program to add the PK-3 credential by completing 24 units in Early Childhood Education and/or Child Development and then directly applying to the Commission.</p> <p>A bridge from the PK-3 credential to the Multiple Subject would best be included in a separate section of Title 5 regulations – section 80499,</p>

	<p>which currently identifies the process for adding a Multiple Subject or Single Subject credential when an individual holds the other.</p> <p><b>No changes to the proposed regulations are recommended, but staff will explore changes to Title 5 regulations section 80499 to create a bridge from PK-3 to Multiple or Single Subject credentials as a potential future regulation change.</b></p>
<p>3. Create Authorizations for Infant/Toddler and 4<sup>th</sup>-6<sup>th</sup> grade</p>	<p><b>Main recommendation</b> – Create separate authorizations for Infants and Toddlers, as well as 4th-6th grade.</p> <p><i>Sample comment - Create developmentally appropriate authorizations that can be added to a PK-3 ECE Specialist Credential for Infants and Toddlers and also for 4th-6th grade.</i></p> <p><b>Response from Commission</b> – Infants and toddlers are already served by teachers who hold a Child Development Permit. No rationale was provided for creating a separate authorization for grades 4-6. Individuals who want to teach in grades 4-6 should pursue a Multiple Subject credential.</p> <p><b>No changes to the proposed regulations are recommended.</b></p>
<p>4. “Grandfather in” current early childhood teachers</p>	<p><b>Main recommendation</b> – Do not put any additional requirements on current early childhood teachers for teaching TK.</p> <p><i>Sample comment - Include systems for “grandfathering in” early childhood teachers into the system to be able to be fully recognized teachers in classrooms rather than to be demoted to aide positions.</i></p> <p><b>Response from Commission</b> – The Education Code sets minimum requirements for teachers in public schools, including those teaching TK, and the Commission does not have the authority to waive statutory requirements such as a bachelor’s degree or the RICA.</p> <p><b>No changes to the proposed regulations are recommended.</b></p>
<p>5. Early Childhood Studies major</p>	<p><b>Main recommendation</b> – Add Early Childhood Studies majors to the list of approved majors for meeting subject matter requirements.</p> <p><i>Sample comment - Section 80067 (d)(2)(A) add “Early Childhood Studies” Section 80067.1 (g)(4)(A) add ““Early Childhood Studies”</i></p> <p><b>Response from Commission</b> – Staff agree with this recommendation.</p> <p><b>Changes to the proposed regulations are recommended.</b></p>

<p>6. Recognition of practicum hours</p>	<p><b>Main recommendation</b> – Recognition of practicum hours in Amendment #1 should be increased to 400 hours.</p> <hr/> <p><i>Sample comment - The staff proposes that up to 200 of the required 600 clinical practice hours for this PK- 3 Credential could be satisfied through a practicum course at community college, four-year, and/or graduate preparation programs (p3).</i></p> <p><i>Recommendation:</i></p> <ul style="list-style-type: none"> <li>• <i>This proposal should be expanded to allow up to 400 hours of practicum across higher education sector; many EC/CD community colleges offer two semesters of practicum; fouryear programs and graduate programs in EC/CD also offer multiple supervised field work/clinical practice experiences.</i></li> <li>• <i>In addition, some campus EC/CD programs offer clinical experience with preschool-aged children and with elementary age children; in that case, supervised elementary education clinical practice hours in a EC/CD baccalaureate or graduate program should count towards a candidate’s clinical practice hours total.</i></li> </ul> <p><i>Recommended Specific Language for Regulations on p 4 of Item 31 I recommend the following language for proposed regulations described on page 4 of Item 31” 80067.1 (g) (4) Change “one or more practicum course(s) supervised by an ECE-trained faculty member at a community college, four-year, and/or graduate program...”with the number of hours completed [served]”... (A) “The practicum...or a degree in Early Childhood Education, Early Childhood Studies, Child Development, Child and Adolescent Development, Human Development, and Child and Family Studies.</i></p> <hr/> <p><b>Response from Commission</b> – Programs have discretion to apply 200 hours of the required clinical practice across the PK-3 grade span.</p> <p><b>No changes to the proposed regulations are recommended.</b></p>
<p>7. Add clarification that practicum hours must be completed in a preschool setting serving 3-4 year olds.</p>	<p><b>Main recommendation</b> – The proposal to allow a practicum to count towards the clinical practice hours needs clarification that these hours have been completed in a preschool setting with 3-4 year olds and not with infant/toddlers.</p> <p><b>Response from Commission</b> – Staff proposes to add language clarifying such in sections 80067 (d) (2) and 80067.1 (g) (4).</p> <p><b>Changes to the proposed regulations are recommended.</b></p>

<p>8. 80067.1 (b) (1) Precondition language cited outdated statutory language</p>	<p><b>Main recommendation</b> – Change the language for proposed 80067.1 (b) (1) to reflect more closely updated language in §44259 (b) (4) resulting from SB 488. Commenters indicate that the current language is outdated by including reference to “study of alternative...”</p> <p><b>Response from Commission</b> – The current language as proposed does include reference to the current §44259 (b) (4) (A) and (B) and does not, as proposed, include the phrase “study of alternative.” It also includes language that existed in previous preconditions that is not outdated. Nevertheless, the suggestion from the public would simplify the language of the precondition.</p> <p><b>Change section 80067.1 (b)(1) to “The program includes the study of effective means of teaching literacy, in accordance with 44259 (b) (4)(A) and (B).</b></p>
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**Table 3. Comments Received that are Outside the Commission’s Authority or Not Directly Related to the Proposed Regulations**

<p><b>Main concern</b> – Revisions to the Child Development Permit have not happened, and it appears there will continue to be a siloing of the early childhood workforce.</p> <p><i>Sample comment - Prior to and during the pandemic, workgroups met to revise the current Child Development Permit (a CTC issued credential) but it has never been finalized/completed. During the pandemic, pilot programs were begun which have not been finalized/complete. See wording from the CTC website below regarding these pilots:</i></p> <p><i>Four distinct pilot opportunities are available under the auspices of the PDG-R grant for interested two-and four-year institution of higher education that offer preparation for the ECE workforce. The pilots will be operational during the PDG-R grant funded period of July 1, 2020-December 31, 2022. For those institutions interested in applying to be a part of the Pilots, applications are available (Application to participate in the ECE Pilots). The four pilots are:</i></p> <ol style="list-style-type: none"> <li><i>1. TPEs implementation pilot</i></li> <li><i>2. Program Guidelines (accreditation) pilot</i></li> <li><i>3. ECE formative Teaching Performance Assessment pilot</i></li> <li><i>4. Program Quality Peer Review</i></li> </ol> <p><a href="https://www.ctc.ca.gov/educator-prep/early-care">https://www.ctc.ca.gov/educator-prep/early-care</a></p> <p><i>In an effort to encompass the different aspects of teacher preparation, breaking down of silos, and creating a reasonable, well-functioning system for children and teachers from age three through grade three, the current proposal for the PK-3 Early Childhood Specialist Credential has emerged.</i></p>
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*Many individuals and state organizations have, at first, seen this move as one that will unify the field of early care and education birth through age eight. This unification and understanding of the developmental needs of young children is essential to the lifelong success of children in both academic and life outcomes. Many saw this as a wonderful opportunity to help ensure the success of our children and our communities. However, this is not the reality of the currently proposed credential, for the expectations of institutes of higher education (IHEs) in implementing the proposed credential, for the teacher preparation students that will be forced to abide by this proposal, or for the children and communities in which this proposal will have a long-term impact.*

**Response from Commission** – The ECE pilots referenced by the commenter had as their goal to assist child development permit preparation programs in engaging in self-review and analysis of their current coursework and programming in light of the increased focus on competency-grounded preparation of the state’s educator workforce, including those working in early childhood education. As part of these pilots, programs were offered the voluntary opportunity to engage in this process of self-analysis with each other and with Commission staff. The ECE Pilots work was supported by funding from the state’s federal Preschool Development Grant-Renewal (PDG-R) and the four pilot efforts were consistent with the direction from the Master Plan to focus on competency-based preparation and licensure as well as to develop a quality review process for programs offering preparation for the child development permit. Participation in the ECE pilots was entirely voluntary on the part of ECE preparation programs at both the community college and the four-year institutions of higher education.

There were three main goals of this work: (1) to engage interested programs in competency-based preparation approaches for the ECE workforce based in part on the adopted ECE Teaching Performance Expectations applicable to candidates for the child development permit along with a concomitant program self-analysis of the degree to which child development permit preparation programs currently would meet the adopted Program Standards for such programs; (2) to develop a new quality review system for ECE child development permit programs based on a peer review approach; and (3) to develop a new ECE formative teaching performance assessment (ECEFTPA) for the teacher level of the child development permit for voluntary future use with candidates in child development permit programs. All of this work has been reported on in prior Commission agenda items referenced in Appendix A of this agenda item. At the present time, all work relating to the ECE Pilots has either been completed or is nearing completion, with a grant funding ending date of June 30, 2024. Programs have voluntarily been engaging in TPE-aligned curriculum (staff notes that the CAP coursework has been aligned to the TPEs for programs using the CAP courses); programs have completed a self-analysis of the degree to which they would be consistent with the program standards; the Program Quality Peer Review process has been developed, piloted, and reported on to the Commission; and the ECEFTPA is still in development with field testing taking place at the present time.

The Commission plans to review the recommendations of the 2015-2017 Child Development Advisory panel in the near future and will keep the public apprised of this work as it unfolds.

**Main concern** – Use the same term for both permits and credentials to prevent siloing.

*Sample comment - Label CTC issued teaching credentials with one word. The siloed nature of “permit” and “credential” continues to divide the early care and education world. For the purposes of providing continuity of understanding and of career pathways, CTC can issue Credentials with level 1-5 that have corresponding coursework, experience, practicum requirements that provide entry level work skills up through master teaching and mentoring skills.*

**Response from Commission** – The Education Code created the terms “credential” and “Child Development Permit,” and the Commission does not have the authority to alter the names without a change in statute.

**Main concern** – The timeline of CTC in pilots undermines the nature of pilots and developing programming that is critical rather than to develop the best practices.

*CTC staff have, on several occasions, stated in meetings that ECE need to be on board with procedures that have been in place in K-12 and we “just need to deal with it”. Our program removed ourselves from TPA piloting when this was the response we received. Our institutions have barriers that we will need to work through to adjust practices and the expectation that it is done on the timeline of CTC, rather than to develop the best practices in pilots undermine the nature of pilots and developing programming that is critical.*

**Response from Commission** – The pilots mentioned are for the Child Development Permit, which is outside the proposed regulations for the PK-3 credential.

**Main concern** – The differentiation between the TPEs for the Assistant Teacher and Teacher level are inappropriate.

*In conversations about differentiating the TPE’s between the Assistant Teacher and Teacher level, (Commission staff) has stated in public that the only difference is that she sat down with the document and changed the verbs. There was no justification as to research behind how these different levels were created, rather it was an individual working on the document on their own without input from the field or research. Teacher Performance Expectations need to be well researched and representative of teacher skills and abilities that are relevant to the group of children they will be working with.*

**Response from Commission** – The Assistant Teacher and Teacher are levels of the Child Development Permit, which is outside the proposed regulations for the PK-3 credential. These issues and concerns can be addressed at a later date when the Commission begins the process of updating the Child Development Permit.

**Main concern** – Remove barriers for individuals with Child Development and Early Childhood majors to enter Multiple Subject programs.

*Remove the barriers for Child Development/Early Childhood majors to enter the multiple subject credential program and add this majors to the list of approved subject matter for the multiple subject credential. Child Development/Early Childhood trained credential teachers are and will continue to be skilled and knowledgeable at providing a high-quality education for children.*

**Response from Commission** – The proposed regulations do not address requirements for the Multiple Subject credential.

**Table 4. Comments that are Unclear**

*Comment - There is a potential massive impact on college programs and financial impact on the student funding formula based on certificate and degree completion.*

**Response from Commission** – The commenter did not identify how the proposed regulations would impact college programs or the student funding formula. Institutions of higher education are not required to create credential preparation programs, and the Commission has strongly encouraged four-year institutions to both work with Community College partners to build 2+2 programs and to develop integrated undergraduate programs that cost students less than traditional fifth year preparation programs.

**Consideration of Amendments**

The table below provides a summary of all proposed regulation changes and the staff recommendation for action on each potential amendment. Staff recommendations are based on evaluation of public comment, consideration of alternatives, state statutes and existing regulations, and reflection on the collaborative work that was undertaken to arrive at the initial regulatory language.

**Table 5. Proposed Amendments to the Regulations Text**

<b>Proposed Amendment</b>	<b>Proposed Text Amendment</b>	<b>Staff Recommendation</b>	<b>Justification</b>
1. Multiple Sections in 80067, 80067.1, and 80067.2: Remove references to PK-3 in Credential Title throughout	N/A	Reject amendment.	The amendment to remove the PK-3 designation was based upon the amendment that created two authorizations (PK-K and 1-3). As that amendment is also recommended to be

<b>Proposed Amendment</b>	<b>Proposed Text Amendment</b>	<b>Staff Recommendation</b>	<b>Justification</b>
regulation.			rejected, the title of the credential should remain as the “PK-3 Early Childhood Specialist Instruction Credential.”
2. 80067, Section (a)(2)(C) and (d)(1): Modifies existing sections to amend the grade ranges for clinical practice requirements from PK-TK and K-3 to PK-K and 1-3.	N/A	Reject amendment.	Multiple groups have expressed concerns with amending the grade ranges for clinical practice requirements without more time to consider the implications of this change. Staff recommend that the Commission retain the option reconsider the need for regrouping these grade levels as more is learned in the implementation of these regulations.
3. 80067, Sections (a)(2)(C)(i): Add new section as an option for candidates that are unable to complete clinical practice in a setting for grades 1-3 to earn a limited authorization.	N/A	Reject amendment and encourage programs to rely upon existing flexibilities in extensions of intern credentials for an additional one year and placement opportunities in summer school and/or other assignments.	The majority of public comments expressed concerns about creating two authorizations. Inequities related to employment opportunities and career advancement are significant concerns. Barriers to completion of clinical practice experiences that may be encountered by intern candidates can be mitigated through existing flexibilities, such as utilization of a third-year intern



Proposed Amendment	Proposed Text Amendment	Staff Recommendation	Justification
			extension and placements in summer school and/ or other assignments to ensure all clinical practice requirements are met.
<p>4. 80067, Section (b)(1): Add clarifying language that the clear credential requires possession of the preliminary credential issued based upon the requirements outlined in subsection (a).</p>	<p>(1) Possession of a <u>preliminary PK-3 Early Childhood Education Specialist Instruction Credential issued based on the requirements outlined in section (a).</u></p>	<p>Approve amendment.</p>	<p>Approval of the amendment clarifies the pathway for earning the clear credential and ensures that all requirements are completed.</p>
<p>5. 80067, Section (d)(2): Add a requirement that programs grant equivalency, as specified, to candidates who have completed a practicum at a regionally accredited institution of higher education.</p> <p>Modify this provision to add the “Early Childhood</p>	<p>As described on page 3 of the agenda item and modified here to include age/grade range:</p> <p><u>80067 (d)(2) Candidates for the ECE Specialist Instruction Credential who have completed a practicum course at a regionally accredited institution of higher education, including a community college, shall be granted clinical practice equivalency for these hours commensurate with</u></p>	<p>Approve Amendment</p>	<p>Recognizes the value and experience of those who have a completed guided, supervised practicum in an institution of higher education, including community colleges toward their required clinical practice hours.</p>

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<p>Studies” degree in (A).</p> <p>Modify this provision to ensure the practicum hours were completed with preschool children.</p>	<p><u>the number of hours served in the practicum course, up to a maximum of 200 hours, provided that all of the following conditions are met:</u></p> <p><u>(A) The practicum course is credit bearing and degree applicable towards a Teacher Level or higher level Child Development Permit or a degree in Early Childhood Education, Child Development, Child and Adolescent Development, <b>Early Childhood Studies</b>, or Human Development.</u></p> <p><u>(B) The practicum hours completed were in a preschool or early childhood setting serving 3-4 year old children and included clinical practice experience that was supervised at minimum by a trained faculty member/instructor who provided observation and feedback to the candidate.</u></p> <p><u>(C) The candidate earned a C or better on the practicum course. Courses earned with a</u></p>		

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	<p><u>“Pass,” or another designation deemed by the institution of higher education to be equivalent to a grade of “C” or higher are also acceptable.</u></p> <p><u>(D) The candidate provides to the Commission-approved ECE Specialist Instruction program verification of the hours served through transcripts and other documentation as determined by the Commission-approved program. (3) Candidates who have completed both a verified work experience as outlined in paragraph (d)(1) above and a qualified practicum experience as outlined in paragraph (d)(2) above may be granted a maximum of 400 hours total toward the clinical practice requirement and shall complete the remaining 200 hours of clinical practice in the teacher preparation program.</u></p>		
<p>6. 80067, Section (e): This new amendment</p>	<p><u>(e) Multiple Subject Teaching Credential Holder Equivalencies:</u></p>	<p>Approve amendment.</p>	<p>Approval of this amendment ensures that educators are not</p>

Proposed Amendment	Proposed Text Amendment	Staff Recommendation	Justification
<p>would clarify that only a Multiple Subject Credential holder who has met all statutory requirements to earn their credential may utilize this option.</p>	<p><u>PK-3 Early Childhood Education Specialist Credential candidates that also hold a valid Multiple Subject Teaching Credential with an English learner authorization who have met all statutory requirements for the Multiple Subject Teaching Credential are exempt from the professional preparation program requirements outlined in subsection (a)(2) and (a)(3) above. Such candidates may apply directly to the commission by submitting all of the following, and may be issued a PK-3 Early Childhood Education Specialist Credential with a term of preliminary or clear based upon and in alignment with the term of their valid Multiple Subject Teaching Credential:</u></p>		<p>able to bypass completion of all statutory requirements. Approval would ensure that Multiple Subject Credential holders that have statutory requirements listed on their credential as renewal requirements (i.e., a Teaching Performance Assessment and/or the RICA) could not utilize this option until those statutory requirements were met.</p>
<p>7. 80067, Sections (f)(1), new section (f)(2), and section (f)(4): Modifies existing authorization statement and adds new</p>	<p>N/A</p>	<p>Reject amendment and encourage programs to rely upon existing flexibilities in extensions of intern credentials for an additional one year and</p>	<p>The majority of public comments expressed concerns about creating two authorizations. Inequities related to employment opportunities and career advancement are significant concerns.</p>

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<p>authorization statement to align with proposed amendments that would create a limited PK-K authorization.</p>		<p>placement opportunities in summer school and/or other classroom assignments.</p>	<p>Barriers to completion of clinical practice experiences that may be encountered by intern candidates can be mitigated through existing flexibilities, such as utilization of a third-year intern extension and placements in summer school and/or other assignments to ensure all clinical practice requirements are met.</p>
<p>8. 80067.1 Section (b)(1): Modify the precondition language to simplify and to add clarity about the alignment with revised §44259 (b) (4) (A) and (B)</p>	<p><del>(b) Literacy Instruction English Language Skills.</del> <del>(1) In each program of professional preparation, candidates demonstrate knowledge of methods of developing English language skills including those for whom English is a second language, in accordance with the Commission's standards and performance expectations.</del> The program includes the study of effective means of teaching literacy, in accordance with 44259 (b)(4)(A) and (B).</p>	<p>Approve amendment</p>	<p>This proposal would simplify and focus the precondition language. No programmatic changes would take place as a result of changes to the precondition because the concepts being removed are embedded in the standards and TPEs for this credential.</p>

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<p>9. 80067.2 Section (c)(1): Modify the language to be consistent with the changes proposed for 80067 (a)(2)(C) related to the division of clinical practice hours.</p>	<p>N/A</p>	<p>Reject amendment</p>	<p>If the Commission makes no changes to the proposed section 80067 (a) (2) (C), no associated change would need to be made to section 80067.2 (1).</p>
<p>10. 80067.2 Section (c)(1): Modify language to make more consistent the language about clinical practice experience in one’s early childhood employment setting with clinical practice requirement for two settings.</p>	<p>Modify the proposed language as follows:</p> <p>(c) Standard 3: Clinical Practice: Opportunities to Learn and to Practice</p> <p>(1) Organization of Clinical Practice Experiences. The program’s clinical practice experiences are designed to provide the candidate with a developmental and sequential set of activities that are integrated with the program’s coursework and extend the candidate’s learning through application of theory to practice with PK-3 students in California early learning settings. Some <del>or all</del> of these experiences may take place within the</p>	<p>Approve amendment</p>	<p>It is highly unlikely that one could meet the requirement for clinical practice as indicated in the proposed regulations and standards through a single employment setting. This clarifies that although one’s employment setting may be used for some of the hours, the full clinical practice requirement will need to be met in accordance with program standard 3.</p>

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	<p>candidate’s California Early Childhood Education employment setting, including (e.g., California State Preschool, Head Start) as well as within TK-3 public school settings, provided the candidate meets the 600 hours of clinical practice as described below.</p>		
<p>11. 80067.1 Section (g)(2): Modify the language in this section to be consistent with proposed changes to 80067 (d) (1)</p> <p>Related to the proposed change to the division of clinical practice hours, PK/TK and K-3 to PK-K and 1-3.</p>	<p>N/A</p>	<p>Reject amendment</p>	<p>If the Commission makes no changes to the proposed section 80067 (d) (1), no associated change would need to be made to section 80067.1 (g) (2).</p>
<p>12. 80067.1 Section (g)(4): Add precondition language to be consistent with the acceptance of practicum hours for clinical practice cited in 80067 (d) (2).</p>	<p>Add the following language:</p> <p><u>80067.1 (g)(4)</u></p> <p><u>Candidates for the ECE Specialist Instruction who have completed a practicum course at a regionally accredited institution of higher education, including a</u></p>	<p>Approve amendment</p>	<p>If the Commission accepts the change to approve 80067 (d) (2) above, the addition of a new precondition mirroring the language would be appropriate.</p>

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<p>Add “Early Childhood Studies” to the list of degrees in (A).</p> <p>Add language ensuring that the practicum experience was in a preschool or early childhood education setting with 3-4 year olds.</p>	<p><u>community college, shall be granted clinical practice equivalency for these hours commensurate with the number of hours served in the practicum course, up to a maximum of 200 hours, provided that all of the following conditions are met:</u></p> <p><u>(A) The practicum course is credit bearing and degree applicable towards a Teacher Level or higher level Child Development Permit or a degree in Early Childhood Education, Child Development, Child and Adolescent Development, Early Childhood Studies, or Human Development.</u></p> <p><u>(B) The practicum hours completed were in a preschool or early childhood setting serving 3-4 year old children and included clinical practice experience that was supervised at minimum by a trained faculty member/instructor who provided observation and</u></p>		



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	<p><u>feedback to the candidate.</u></p> <p><u>(C) The candidate earned a C or better on the practicum course. Courses earned with a "Pass," or another designation deemed by the institution of higher education to be equivalent to a grade of "C" or higher are also acceptable.</u></p> <p><u>(D) The candidate provides to the Commission-approved ECE Specialist Instruction program verification of the hours served through transcripts and other documentation as determined by the Commission-approved program.</u></p> <p><u>(5) Candidates who have completed both a verified work experience as outlined in paragraph (g)(2) above and a qualified practicum experience as outlined in paragraph (g)(4) above may be granted a maximum of 400 hours total toward the clinical practice requirement and shall complete the</u></p>		

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	<u>remaining 200 hours of clinical practice in the teacher preparation program.</u>		

**Staff Recommendation**

Staff recommends that the Commission consider all public testimony made during the public comment portion of this item, as well as written comments submitted prior to the hearing. Staff recommends that the Commission consider the proposed amendments in Table 4 when adopting the final version of the proposed regulations.

**Next Steps**

Staff will continue the prescribed process for the regulations approved by the Commission for submission to the Office of Administrative Law.